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Project Number N4152

Mr. James Shafer
Remedial Project Manager
EFA Northeast, Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, Pennsylvania 19113

Reference: CLEAN Contract No. N62472-90-D-1298
Contract Task Order No. 0833

Subject: Summary of Discussions, May 30, 2002
Old Firefighting Training Area
Naval Station Newport, Newport Rhode Island

Dear Mr. Shafer:

Attached you will find a summary of discussions from the meeting held at Naval Station Newport on May 30, 2002. This meeting was held to discuss the value of the habitats versus the damage that would be caused by dredging actions evaluated in the FS. Please note that RIDEM withheld their position on the value of dredging eelgrass areas until a later date.

If you have any questions regarding this material, please do not hesitate to contact me.

Very truly yours,

Stephen S. Parker
Project Manager

SSP/rp

Enclosure

c: M. Griffin, NSN (2 w/encl.)
P. Kulpa, RIDEM (4 w/encl.)
K. Keckler, USEPA (4 w/encl.)
K. Finkelstein, NOAA (2 w/encl.)
J. Stump, Gannet Flemming (w/encl.)
J. Trepanowski/G. Glenn, TtNUS (w/ encl.)
File N4152-3.2 (w/o encl.)/N4152-8.0 (w/encl)

**SUMMARY OF DISCUSSIONS**
**OLD FIREFIGHTING TRAINING AREA - DREDGING OPTIONS**
**May 30, 2002**
**Building 1, Naval Station Newport,**
**Newport Rhode Island**

In attendance were:

P. Colarusso, USEPA
K. Finkelstein, NOAA
J. Forrelli Tetra Tech NUS, Inc.
G. French, NOAA
M. Griffin, NSN
B. Hoskins, USEPA
K. Keckler, USEPA
P. Kulpa, RIDEM
N. Kuntzelman, Northdiv
S. Parker, Tetra Tech NUS, Inc.
J. Shafer, Northdiv
J. Stump, Gannet Flemming

The meeting was called by the review parties for the Feasibility Study to discuss the benefits and hazards of dredging sediments near the OFFTA site at Naval Station Newport. The meeting convened at approximately 9:45 AM, and adjourned at 12:15 PM. The following summarizes the discussions held and the agreements reached during this meeting.

1) Tetra Tech NUS, Inc. provided an abbreviated presentation of the site model, the findings of the risk assessment and the PRG development process. The presentation provided avenue for discussion on the presumed and interfering contaminant sources, the toxicity tests performed and the habitats that are present in the different portions of the site. While some of the attendees were familiar with these items, some were not familiar at all with them. However, rather than providing a detailed explanation of previously published documents, those persons unfamiliar with the details deferred agreement with the estimation of risk and development of the PRG values to others of their offices who were more familiar with those aspects of the project. In this manner, NOAA and EPA representatives concurred with the Final ERA and PRG development and agreed to move ahead with discussion of the remedial actions. RIDEM alone pointed out that the Office of Waste Management did not agree with the findings of the ecological risk assessment or the PRGs calculated for the site. RIDEM also stated that if the Navy proceeded with an action based solely on the PRGs in the Draft Final FS, they would issue a notice of violation to the Navy.

2) It was clarified that some of the sediments within the eelgrass beds at on the north and west of the site do have contaminants that exceed PRGs. It was noted that the extent of this area has not been completely defined, and the Navy has committed to additional sampling to provide resolution of that area prior to completion of the proposed plan.

3) The majority of the persons present agreed that based a) on the contaminant concentrations published in the FS report and b) the presumed extent of those contaminants exceeding PRGs within that eelgrass bed, the eelgrass should not be disturbed by dredging within those beds or in a proximity that would impact them. P. Colarusso of the EPA agreed, and stated that this agreement was based on the ecological importance of the eelgrass for biota, the limited amount (approximately 100 acres) of known eelgrass in Narragansett Bay, its sensitivity to disruption and the mixed success documented to transplant or replant. Additionally, the eelgrass provides some support for the natural degradation of PAHs as the root zones aerate the sediment which allows biodegradation to occur. Mr. Colarusso also stated that excavation near the eelgrass should be done with equal consideration to its preservation. He made the point that so called "precision dredging" operations sometimes leave unrealistic slopes and edges that erode and are not necessarily protective of the surrounding habitats. P. Kulpa stated that he would have to discuss this issue with others in his office, so could not concur at this time

4) It was noted that the ecological PRGs have not yet been compared to contaminant concentrations within the intertidal zone. This was partly because there is some uncertainty of whether the risk to the test organisms (as waterborne species) would be applicable to intertidal species. It was also because the intertidal area is already considered "actionable" due to the exceedance of the human health PRGs. EPA, RIDEM and NOAA all agreed that the ecological PRGs should be applied to the intertidal area. The Navy agreed to evaluate this and make revisions as necessary.

5) The discussion was extended to other areas of the shoreline, and the non eelgrass areas, including the intertidal zone and the subtidal areas where eelgrass was not present. The Navy stated that they would like to propose to remove the presumed historic source of the site contaminants (the on-site soils) as far seaward as the high tide line, install a rip-rap retaining wall where necessary to prevent erosion, then monitor the intertidal and subtidal sediment for a period of time before agreeing to dredge these areas. This would be performed as an "Interim Remedy". The Interim Remedy would allow a period of annual monitoring to show if the removal of the site soils has a positive effect on these sediments. It would also provide some information on how much of the contaminant load is being provided by the storm drain outfalls at the site. The Navy's recommendation for the interim remedy is based on the uncertainty of the source of the PAHs in the sediments, and pointed out that PAHs are input to the ecological system at the site through storm drains at the site, overland flow, waste discharges and boat traffic (*see note at the end of this summary).

Other attendees did not share the Navy's recommendation, and stated that such an action does not provide for removal of risk from the contaminants existing within the sediments. EPA stated that there is a draft document that provides guidance for selecting a "Monitored Natural Recovery" remedy, and requested that if the Navy wants to leave the contaminants in place, they will have to demonstrate that the conditions are present which would support natural breakdown of and/or sedimentation over the contaminants that exceed PRGs. EPA also indicated that any dredging performed to meet ecological PRGs should be done to the depth of

the "critical habitat zone" or to the depth of the PRG exceedance, whichever is shallower, in both the intertidal and subtidal areas.

6) Near the conclusion of the meeting, RIDEM stated again that the Office of Waste Management did not concur with the risk assessment or the PRGs provided by the Navy at the site. RIDEM proposed that the Navy apply a combination of human health based PRGs and ecological PRGs calculated for McAllister Point landfill to the site. They provided a map describing their interpretation of the locations that exceeded these PRGs and requested the group consider them.

*NOTE: Following the meeting, it was learned that the approximately 5 acres of the area drained by the storm drains discharging at the site is planned to be redeveloped in the fall of 2002. This area is focused on former Building 149, located on the south side of Taylor Avenue, adjacent to the site. Building 149 was a Brig, and was demolished in 1996. NPDES requirements to be implemented in March 2003, require any new development larger than 3 acres on a naval facility have a storm water treatment system. Because this project includes five acres, such a system is required and will consist of either a sediment vortex capture system or an oil-water separator. Additional details of the system selection and design will be provided after the design specifications are completed.